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May 20, 2019

BY ECF and FIRST CLASS MAIL

The Honorable George B. Daniels, U.S.D.J.
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Ninety-Five Madison Company, L.P. v. Vitra International AG*,
Civil Action No.: 1:19-cv-1745, Request for Extension of Time

Dear Judge Daniels,

This firm represents Plaintiff, Ninety-Five Madison Company, L.P. (“NFMC”), in the above referenced matter. On May 9, 2019, Defendant Vitra International AG (“Vitra”) filed a Motion to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) and 12(b)(5). (Doc. Nos. 9-11). Pursuant to *L. Civ. R. 6.1(b)*, NFMC’s opposition is currently due May 23, 2019, and Vitra’s reply is currently due May 30, 2019. The Court has scheduled oral argument on the Motion to Dismiss for July 10, 2019. (Doc. No. 16).

The parties wish to set a briefing schedule that allows both sides additional time to oppose and reply to the Motion to Dismiss. The parties are currently in the process of agreeing on a briefing schedule that will not result in any change to the July 10, 2019 oral argument. Once the parties agree on a briefing schedule, they will file that proposed schedule with the Court. This is the first request for an extension of time with respect to the Motion to Dismiss opposition and reply. Counsel for Vitra consents to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,



Robert Laplaca

cc: James M. Hirschhorn (by ECF only)
Joshua N. Howley (by ECF only)
Mark Steven Olinsky (by ECF only)